

Washington State Building Code Council
Attn: Stoyan Bumbalov
1500 Jefferson St SE
Olympia, WA 98501

March 10, 2022

Dear State Building Code Council,

I'm writing to you today in opposition to two proposals that severely limit energy choices for Washington multi-family builders. These three proposals will detrimentally affect families that can least afford to bear the burden of restricting use of natural gas and propane in multi-family buildings built under the International Building Code without a comprehensive plan to meet the energy demand affordably.

Both provisions (C403.1.1 and Appendix D – Space Heating Proposal and C404.2.1, C404.7, C503.59 – Heat pump water heating) should not be included in the final iteration of the WSEC-Commercial. **These provisions have no regard for electric grid reliability and makes assumptions that statewide electrification efforts will be successful and affordable.** Natural gas and propane have traditionally been used as an alternative or supplement to electrical power.

These two proposals have no regard for cost or reliability of heat pump water heating or space heating equipment. Heat pump systems are a major financial investment that will be passed onto renters if the WSEC-Commercial is passed as currently written.

Example 1: The U.S. Department of Energy reports heat pump water heaters add \$500 onto each apartment unit constructed.

Example 2: According to a June 2021 presentation given by the Seattle Department of Construction and Inspection, the range of heat pump heating options to service multi-family units range from \$8,000 to \$22,000 per apartment constructed.

It is ludicrous to think that while we are in the middle of a housing crisis and under-built by over 250,000 housing units across the state that we would make rental housing even more expensive!

There are real costs associated with these proposals and being one of the first states to adopt an outright ban on natural gas and propane in multi-family construction will hurt the lowest-income families in our state. These families should not have to choose between heating or eating, or worse – becoming homeless.

We have a very real rent affordability crisis and adding more cost to multi-family construction further prices out people out of the ability to shelter themselves. We urge exclusion of these proposals in the final adopted version of the WSEC-Commercial.

Thank you,

Deb Flagen